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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

UNITED STATES OF AMERICA,

1:23-cv-00284-MO

Plaintiff,

v.

**COMPLAINT, *in rem*,
FOR FORFEITURE**

**\$402,740.00 U.S. CURRENCY;
ASSORTED PRECIOUS METALS;
ASSORTED VEHICLES, HEAVY
EQUIPMENT, AND TRAILERS WITH
TOOLS AND APPURTENANCES
*et al., in rem,***

Defendants.

Plaintiff, United States of America, for its complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, \$402,740.00 U.S. Currency; Assorted Precious Metals (Gold and

Silver coins/bars); 2012 Dodge Ram 3500 Truck with 2014 Transfer Flow in-Bed Auxiliary Diesel Fuel Tank, its tools and appurtenances, VIN 3C63DRJL0CG262204 and VIN 1400144896004C24H29; PJ 5th Wheel Low Pro Flatbed Trailer with Ramp, its tools and appurtenances, VIN 289320300; Kubota SVL95-2S Track Skid Steer, its tools and appurtenances, Serial No. 1051024; Kubota KX040-4 Excavator, its tools and appurtenances, Serial No. KBCK0404KK3C33764; 2016 Load Trail Tilt Deck Trailer, its tools and appurtenances, VIN 4ZETD2028G1110437; 2020 Dodge Commercial Ram 3500 Truck, its tools and appurtenances, VIN 3C7WRTCL3LG110390; Carry-On Trailer Corp. Patriot Dump Trailer, its tools and appurtenances, VIN 4YMBD1429JR000541; 2020 MultiQuip QP-2TH Water Pump with trailer, its tools and appurtenances, Serial No. 2TH-27311; and JCB 8035ZTS Compact Excavator, its tools and appurtenances, Serial No. JCB09035HG2440216 (*hereinafter referred to as* \$402,740.00 U.S. Currency *et al.*) were seized in the District of Oregon, and are now, and during the pendency of this action, will be within the jurisdiction of this Court.

III.

Defendants, *in rem*, \$402,740.00 U.S. Currency *et al.* represent proceeds traceable to an exchange for controlled substances or were used or intended to be used to facilitate such a transaction in violation of 21 U.S.C. § 841(a)(1), and are forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(6), as more particularly set forth in the declaration of Juan Sierra, Special Agent, Drug Enforcement Administration, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendants, *in rem*, \$402,740.00 U.S. Currency, *et al.*, that due notice be

given to all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: February 28, 2023

Respectfully submitted,

Natalie K. Wight
United States Attorney

s/ Amy E. Potter
AMY E. POTTER
Assistant United States Attorney

VERIFICATION

I, JUAN SIERRA, declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Drug Enforcement Administration and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Juan Sierra
JUAN SIERRA
Special Agent
Drug Enforcement Administration